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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA)		
)	No.	06 CR 638
)		
V,)		
)	Hon. David H. Coar	
SHARNEL PLUMMER,)		
DARYL GRIFFIN, and)		
GERALD CALHOUN)		

AGREED PROTECTIVE ORDER

The United States of America, by its attorney, PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, SHARNEL PLUMMER, by his attorney, RALPH SCHINDLER, DARYL GRIFFIN, by his attorney, STEPHEN EBERHARDT, and GERALD CALHOUN, by his attorney IMANI CHIPHE, have agreed to entry of the following Order concerning discovery in this matter.

IT IS HEREBY ORDERED THAT:

- 1. The government proposes to provide the defendant with certain personnel records (the "records") of several potential government witnesses, all of whom are law enforcement officials.
- 2. Due to the sensitive nature of the records that are being disclosed and to protect the privacy of these individuals, the Court hereby orders pursuant to Fed. R. Crim. P. 16(d)(1), that the use of the records by the defendant will be restricted as follows:
- a. The attorney for the defendant may disclose the records only to his client, and such disclosure may occur only after the attorney for the defendant advises the defendant of the prohibitions of this protective order;

b. The attorney for the defendant is not to make any additional copies of the records without prior authorization of the court;

c. The records are for use only in this case, and they are not to be disseminated or used for any other purpose;

d. The records are to be returned to the government after the trial and any appeal have concluded; and

e. Any pleading referencing the records shall be filed under seal.

IT IS SO ORDERED.

APPROVED:

DAVID H. COAR

United States District Judge

Dated: June <u>8</u>, 2007